



October 4, 2004

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: Commission's Rules to Benefit the Consumers of Air-Ground Telecommunications Services

The Air Carrier Association of America ("ACAA") offers the following comments regarding the Federal Communication Commission's examination of the rules governing the provision of air-ground telecommunications services on commercial aircraft.

The ACAA represents low-fare airlines. As a number of Department of Transportation studies have acknowledged, consumers benefit when competition exists. Moreover, accessible and affordable air service is essential for continued economic and business growth. The economy benefits when more people, particularly business travelers, increase their use of the nation's air carriers.

To do this, it is essential that travelers be provided with the ability to communicate with colleagues and family. Travelers want voice and data connectivity in flight for various services. It allows those travelers to travel even when they have other demands. ACAA asks the FCC to move forward with the restructuring of the rule applicable to the 800 MHz Air-Ground Radiotelephone Band. As part of this effort, the FCC should take steps to allow multiple broadband providers. Competition benefits all.

Sincerely,

Edward P. Faberman
Executive Director